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April 22, 2008

VIA HAND DELIVERY

Ms. Victoria Rutson
Chief, Section of Environmental Analysis
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: Finance Docket No. 35095, The Alaska Railroad Corp. -- Petition For An
Exemption From 49 U.S.C. §10901 To Construct and Operate a Rail Line
Extension to Port MacKenzie, Alaska

Dear Ms. Rutson:

On behalf of the Alaska Railroad Corporation (ARRC), enclosed for your review please find a proposed scope of work for wetlands mapping and functional assessment to be performed by HDR Engineering on behalf of ARRC in connection with the above-captioned proceeding.

Please let me know if you have any questions.

Sincerely,



Kathryn Kusske Floyd

Enclosure

cc: Dave Navecky (w/encl.)
Alan Summerville (w/encl.)
Brian Lindamood (w/encl.)



Port MacKenzie Rail Extension Project

Work Activity 005, Wetlands Mapping and Functional Assessment

Objective: Develop general wetlands mapping of the proposed rail alignments in the Environmental Impact Statement (EIS) being prepared for the project and assess functions and values of the mapped wetlands. The mapping and functional assessment will be used to evaluate and compare potential wetlands impacts among the alternatives.

Scope: HDR will develop geographic information system (GIS) based wetlands mapping for the Port MacKenzie Rail Extension project alternatives that are under evaluation during the National Environmental Policy Act (NEPA) process and analyze the functions and values associated with potentially impacted wetlands. The mapping will support evaluation of the alternatives contained in the EIS. A reconnaissance-level field investigation will be conducted to verify GIS-based mapping and assess wetland functions, and will include visits to reference sites established in the Matanuska-Susitna Borough for developing wetlands banking.

We will map a 1,000-foot-wide corridor centered over the current alternative alignments. Mapping will involve a GIS-based assessment of high resolution aerial photography, 5-foot contours of the project area, soil survey mapping, National Wetlands Inventory (NWI) mapping, hydrology data available for the project area, and other data that may be available for the project area. Wetland upland boundaries and changes in wetland types will be delineated by heads-up digitizing in GIS. Wetland types will be coded based on the U.S. Fish and Wildlife Service Cowardin classification system used in NWI mapping.

We will field verify approximately 10% of the polygons mapped. Field verification will follow methods established in the U.S. Army Corps of Engineers (USACE) 1987 Wetlands Delineation Manual and the 2007 Alaska Regional Supplement. Methods used for the functional assessment will be agreed upon with the USACE before field investigations. In addition to project area wetlands sampling, wetland reference sites established in the Matanuska-Susitna Borough for wetland banking will be revisited to ensure consistency between previous studies and this study.

The field verification will be used to refine wetland types and boundaries. Functional assessment data collected in the field will be incorporated into a GIS-based functional assessment.

The deliverables for the project will include

- A wetlands technical report detailing the methods and results, showing mapped wetlands and describing wetland functions in the project area. The purpose of the report will be for NEPA analysis and may not be adequate for future permitting.
- Mapped wetlands in geodatabase format

Task 1. Gather Existing Information and Develop Study Plan. HDR will gather available digital and non-digital information on wetlands, soils, and vegetation in the area. Most of these data were gathered during the environmental screening phase of the project. Missing data includes 5-foot contours of the project area based on aerial photography taken in September 2007. A study plan will be developed that outlines the level of effort and methods for GIS-based wetland mapping, field verification, and functional assessment. This study plan will be discussed with and confirmed by the USACE prior to the field effort.

Task 2. Pre-Mapping. The study area will be pre-mapped using heads-up digitizing on aerial photography in GIS. Polygons will be attributed using NWI codes. Representative wetland sample sites and hard to map areas will be identified for investigation during the field reconnaissance survey. Wetlands within a 1,000-foot corridor centered over alternative centerlines will be mapped. Current alternatives include approximately 110 linear miles that will require mapping. We estimate that wetland scientists will map approximately 4 miles a day. Data used to assist in wetland boundary digitizing will include soil survey, NWI, 5-foot topography, and previous wetland studies conducted in and near the project area.

Task 3. Field Reconnaissance. Three teams of two wetland scientists will conduct a field reconnaissance survey of up to 10% of wetlands in the project corridors. Sample locations will be pre-determined during the pre-mapping task and will include previously established wetland reference sites. Sampling will be in accordance with USACE 1987 Wetland Delineation Manual, 2007 Alaska Regional Supplement, and USACE-approved functional assessment procedures. Sample sites will be accessed by vehicle and helicopter and we estimate that field teams will complete sampling within 5 10-hour days. Accommodations will be made for NEPA team members and agency representatives to accompany field crews.

Task 4. Final Mapping, Data Entry, QA/QC, and Data Management.

Pertinent wetland data from the routine wetland delineation forms and the functional assessment forms will be incorporated into a database. Entered data will undergo a QA/QC process to ensure accuracy. Mapping will be refined to reflect the field reconnaissance. Data on wetland functions collected during the field reconnaissance will be included in a GIS-based wetland function model.

Task 5 Technical Report and Geodatabase. The mapping, field reconnaissance, and functional assessment will be summarized in a Wetlands Technical Report. The report will detail methods and findings, and will be designed for use by the NEPA team to assess the potential impacts to wetlands from the EIS alternatives. The report will be designed to meet the NEPA requirements of the USACE, but may not meet permitting needs. A geodatabase including the mapped wetland polygons and associated attribute data will be submitted for use by the EIS team to evaluate potential wetland impacts.

Resources: Principal – Mark Dalton
Program Manager – Donna Robertson
Project Manager – Malcolm Salway
Sr. Env. Scientist/QAQC – Anne Leggett
Wetland Scientist – To be assigned
Wetland Mapping – To be assigned
Data Manager – Holly Fair
Clerical/Admin – Robyn Syren

Deliverables: Wetland Technical Report
Mapping in GIS format

Preliminary Schedule:

May	Develop and finalize study plan; begin preliminary mapping
June:	Complete preliminary mapping
July	Receive rights-of-entry as necessary; prepare for field work
August	Fieldwork
September:	Complete final mapping
October:	GIS analysis for functional assessment
November:	Reporting

Assumptions:

- The methods and level of detail of field work and functional assessment must be discussed with, and confirmed by, the USACE prior to field work. The proposed level of effort may change as a result of their guidance. USACE input is important for their cooperating agency status on the EIS and their ability to use the EIS to satisfy their NEPA requirements. No more than three meetings with the USACE will be required.
- Project team meetings include weekly meetings with the ARRC, MSB, and consultant project team to discuss project related issues. Meetings will last no more than 2 hours and include time to prepare meeting notes and discuss relevant issues with project staff.
- Wetland classification will use the nomenclature from Cowardin, et al. (1979).
- Mapping corridor will be 1,000 feet wide and 110 miles long (includes segments of each alternative currently under evaluation). The alternative alignments will not change after preliminary mapping is initiated.
- A field effort of 15 team days (3 teams for 5 days) will be sufficient to cover the mapped corridor.
- Portions of the project that are not on the road system will be accessed by using an R44 helicopter.
- Topography at 5-foot contours will be supplied by the ARRC or its contractors based on 2007 aerial photography of the project corridor.
- Wetland mapping outside of the 2007 aerial photography will be based on existing Matanuska-Susitna Borough aerial photography and U.S. Geological Survey topographic contours.
- Wetland field crews will avoid private lands to the extent possible. We will request right of entry onto state and borough lands and owners of large land parcels such as Mental Health Trust, Native Corporations, and farm owners.
- HDR will produce no more than 6 hard copies of draft and final reports and mapping. Additional report copies will be provided electronically in PDF format.